

VIA ECF

Honorable Lorna G. Schofield
United States Court
Southern District of New York

Re: *Jovani Fashion, Ltd., v. Jasz Couture, Inc. et al.*, Case No. 23-cv-1994

Dear Judge Schofield:

Pursuant to the Court's order of April 20, 2023, Plaintiff Jovani Fashion, Ltd. ("Jovani" or "Plaintiff") and Defendants Jasz Couture, Inc. ("Jasz") and Tawinder Singh (with Jasz, "Defendants") (collectively, the "Parties") submit this joint status letter.

A. DISCOVERY THAT HAS TAKEN PLACE.

1. Discovery Propounded.

On May 1, 2023, Plaintiff has propounded a set of Requests for Production, a set of Requests for Admission, and a set of Interrogatories on Defendants jointly.

2. On May 16, 2023, the Parties agreed to a 30-day stay on discovery in order to engage in an informal exchange of information and settlement discussions, subject to extension by mutual agreement of the parties by and through counsel.

3. See above (2).

B. PROCEDURAL HISTORY.

1. Pleadings.

Plaintiff filed its Complaint on March 8, 2023. Defendants filed an Answer on April 17, 2023.

2. Motions Filed.

Valerie M. Wagner, counsel for Defendants, filed a Motion for Admission *Pro Hac Vice* on May 3, 2023, which the Court granted on May 24, 2023. The Parties submitted a Stipulated Confidentiality Agreement and Protective Order on May 17, 2023, which the Court entered on May 18, 2023.

3. Motions Pending.

There are no motions pending.

C. PLANS TO MEET DISCOVERY DEADLINES.

Discovery is presently stayed by agreement of the Parties so that they can engage in settlement discussions. If these discussions are not successful in the near term, the Parties will resume written discovery promptly and meet and confer regarding deposition scheduling.

Sincerely,

/s/ Valerie M. Wagner

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